

EXHIBIT 9

1
2 UNITED STATES DISTRICT COURT
3 FOR THE WESTERN DISTRICT OF VIRGINIA
4 Charlottesville Division
5
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7 ELIZABETH SINES, et al.,

8 Plaintiffs

9 vs. Civil Action No.

10 JASON KESSLER, et al., 3:17-cv-00072-NKM

11 Defendants
12 _____/

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14
15
16
17 REMOTE VIDEO-RECORDED DEPOSITION

18 OF

19 JEFFREY STEPHEN SCHOEP

20 JULY 21, 2020
21
22

23 REPORTED BY:

24 R. Dwayne Harrison

25 Job No. 181000

1 JEFFREY STEPHEN SCHOEP

2 to determine it's more recent?

3 A There was -- I don't remember what it was,
4 but there was something -- there was something in the
5 last -- in the 25th one that I didn't like and that I
6 changed. I don't remember what it was, but I knew if I
7 read it that I could tell if it was more recent or not.

8 Q When you look at 25 here there isn't
9 something that you disagree with?

10 A I'm not talking about now. I'm talking
11 about there was something -- there was something in
12 that point that I -- that I didn't care for and I can't
13 remember what it was, but there was something that was
14 changed in that point at some point.

15 MR. ISAACSON: I don't have any further
16 questions today.

17 [No verbal response.]

18 All right. So we're finished?

19 THE REPORTER: Anybody have any questions?

20 MR. REBROOK: This is Edward ReBrook. I
21 actually do have a question.

22 I've been informed indirectly that
23 Mr. Colucci is on vacation and won't be able to be
24 deposed on Thursday and then I don't know who we're
25 supposed to get on the phone for the Nationalist Front.

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2 We've covered a lot of Nationalist Front ground today.

3 Did you all have -- are you expecting
4 someone to be calling in tomorrow for Nationalist
5 Front?

6 MR. ISAACSON: Yes. We don't know. We
7 have -- are we still on the record?

8 THE REPORTER: We're still on the record.

9 MR. ISAACSON: Mr. Schoep, if I could just
10 ask you, as of today, you don't speak for the
11 Nationalist Front?

12 THE WITNESS: Absolutely not.

13 MR. ISAACSON: So, Yotam, you correct me if
14 I'm wrong...

15 [Inaudible.]

16 MR. BARKAI: I'm sorry, what did you say?

17 MR. ISAACSON: [Inaudible.] It's lawyer
18 talk.

19 MR. REBROOK: I'm hearing just feedback.

20 THE REPORTER: Yeah, I'm also hearing
21 feedback. I didn't hear the question.

22 MR. BARKAI: I'm also hearing feedback.

23 This is a 30(b)(6) deposition of Nationalist Front. So
24 it's Nationalist Front and Nationalist Front's
25 counsel's responsibility to designate a representative

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2 to be deposed.

3 MR. REBROOK: Yeah, I get that. That's
4 helpful. I can't just create a person out of thin air.
5 If you have somebody you want me to have on the call
6 tomorrow, I'll have that person on the call, but I
7 can't go with a generality. I need an actual name.

8 MR. ISAACSON: I think you're going to have
9 to send some sort of objection or whatnot to -- if
10 you're not going to have someone appear.

11 MR. REBROOK: How about this. You get
12 someone to appear for United Telephone & Telegraph
13 Company tomorrow. Can you do that for me? You can't,
14 right, because it's not a functioning organization?

15 MR. ISAACSON: I don't think this is
16 productive right not.

17 MR. REBROOK: Maybe not, but you're being
18 unreasonable if you don't hear how reasonable I'm
19 being.

20 MR. ISAACSON: Mr. -- I think we can
21 conclude the deposition with Mr. Schoep; is that
22 correct?

23 MR. REBROOK: Yes.

24 MR. ISAACSON: Mr. Schoep, you are free to
25 shut down your video.

JEFFREY STEPHEN SCHOEP

State of Maryland

City of Baltimore, to wit:

I, R. Dwayne Harrison, a Notary Public of
the State of Maryland, Baltimore City, do hereby
certify that the within-named witness personally
appeared before me at the time and place herein set
out, and after having been duly sworn by me, according
to law, was examined by counsel.

I further certify that the examination was
recorded stenographically by me and this transcript is
a true record of the proceedings.

I further certify that I am not of counsel
to any of the parties, nor in any way interested in the
outcome of this action.

As witness my hand and notarial seal this
27th day of July 2020.

R. Dwayne Harrison
Notary Public

My Commission Expires:
September 15th, 2021